REMARKS

The Office Action dated December 9, 2005, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1 and 6 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 1-10 are submitted for consideration.

Claims 1-10 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,483,585 (Parker). The rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in independent claims 1 and 6, and/or any claims dependent therefrom.

Claim 1, upon which claims 2-5 depend, recites a method for the management of subscriber functions. The method is used to manage subscriber functions in a telecommunication network. The subscriber functions are stored in records. The method includes the steps of defining one or more default function sets, each default function set including one or more subscriber functions of a digital telephone exchange defined as default functions and partitioning subscribers of the digital telephone exchange into default subscribers and special subscribers. The default subscribers are those subscribers whose subscriber functions correspond to one of the default function sets and the special

subscribers are those subscribers whose subscriber functions do not correspond to any of the default function sets. The method also includes the steps of storing subscriber functions consistent with the default function sets in default records, each single default record being common to a plurality of default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned and storing subscriber functions for each special subscriber in subscriber-specific records, each subscriber-specific record being specific to the special subscriber concerned. The method further includes the steps of reading the subscriber functions for each default subscriber of the plurality of default subscribers from the default record concerned and reading the subscriber functions for each special subscriber from the subscriber-specific record for the subscriber concerned.

Claim 6, upon which claims 7-10 depend, recites a system for the management of subscriber functions. The system includes a telecommunication network. The system also includes subscriber functions for subscribers in the telecommunication network and a number of records, in which the subscriber functions are stored. The system includes one or more default records in which subscriber functions consistent with default function sets are stored and from which the subscriber functions for default subscribers are read, each single default record being common to a plurality of default subscribers whose subscriber functions correspond to the subscriber function in the default record concerned and one or more subscriber-specific records in which the subscriber functions for each special subscriber are stored and from which they are read.

As will be discussed below, the cited prior art reference of Parker fails to disclose or suggest the elements of any of the presently pending claims.

As mentioned in our previous Response, Parker teaches a telecommunications system that includes a local exchange or switch, an element manager for the exchange and a configuration manager for the element manager. Col. 2, lines 50-53. The element manager and the configuration manager operate in what is known as an object-oriented environment. Col. 3, lines 23-25. The object class of the element manager includes a CUSTOMER-PROFILE, a DIRECTORY-NUMBER, an ACCESS-PORT, CUSTOMIZED RESOURCES, CALL-FORWARDING, THREE PARTY AND CALL WAITING. Each instance of the CUSTOMER-PROFILE represents the data of a particular customer or subscriber of the exchange. Col. 3, line 59- Col. 4, line 10. When it is desired to configure the element manager so as to provide a new customer with basic telephone services, or provide an existing customer with a supplementary service, or remove a supplementary service or basic telephony services from an existing customer, instances of various object classes used in the element manager are created or modified as appropriate. Col. 5, lines 2-30. For each existing customer, an instance of the customer profile object is stored in an object store 31. Col. 5, lines 21-26. After receiving a request for data on a specified customer, the instance of the CUSTOMER-PROFILE object is retrieved from the object store 31 for the specified customer. The instance includes the data on the customer which is then displayed. Col. 6, lines 15-30. If a user wishes to create a new customer, the user enters

the information associated with the customer and a new instance of the CUSTOMER-PROFILE object is created. Col. 6, lines 31-39.

Applicant respectfully submits that Parker does not teach or suggest the elements of each of the presently pending claims. Claim 1, in part, recites storing subscriber functions consistent with the default function sets in default records, each **single** default record being common to **a plurality** of default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned and reading the subscriber functions for each default subscriber of the plurality of default subscribers from the default record concerned. Claim 6, in part, recites one or more default records, in which subscriber functions consistent with default function sets are stored and from which the subscriber functions for default subscribers are read, each **single** default record being common to **a plurality** of default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned. Applicant submits that Parker does not teach or suggest **each single default record being common to a plurality of default subscribers** whose subscriber functions correspond to the subscriber functions in the default record concerned as recited in each of claims 1 and 6.

The Office Action alleges that the term "record" recited in the present application is equivalent to the "data store" disclosed in Parker. Applicant submits that it is well know in the art that the term "record" refers to a single information element of a database rather than to a complete database or data store. The data store 31 of Parker is an object-oriented data store which includes instances of an object class CUSTOMER-PROFILE.

Col. 6, lines 19-22 of Parker clearly discloses that such an instance includes data on a specified customer. However, Parker fails to teach or suggest that any of these instances includes data on more than one customer. Because Parker fails to teach or suggest any single instance of the object class CUSTOMER-PROFILE that is common to a plurality of default subscribers, or for that matter, to a plurality of any subscriber, Applicant submits that Parker fails to teach or suggest the default record of the present application.

Applicant further submits that Col. 6, lines 4-15 and Col. 8, lines 4-21 of Parker do not disclose in anyway a single default record common to a plurality of subscribers, as alleged by the Office Action. The cited sections of Parker merely discuss how an instance of an object class CUSTOMER-PROFILE may include data on a customer with basic telephony services. There is no teaching or suggestion that a single instance of the object class CUSTOMER-PROFILE might be common to a plurality of customers with basic telephone service.

In the "Response to Arguments Section" of the Office Action, it is alleged that Parker does teach a single default record (See Fig. 2 and data/object store 31) into which information about the service of a plurality of customers with basic telephony services are stored, and a single default record from which information about the service of a plurality of customers with basic telephony service are read. Applicant continues to disagree with this statement and submits that the cited portions of Parker fail to teach or suggest that the signal default **record** (not database) is associated with the plurality of customers with basic telephony services. Rather, Applicant submits that the cited

portions of Parker disclose retrieving and storing an instance of an object class CUSTOMER-PROFILE for a specified customer. Applicant submits that there is nothing in the cited portions of Parker to suggest that the one instance would be used for a plurality of customers. Furthermore, Col. 5, lines 2-26 of Parker, for example, discloses creating a new instance of CUSTOMER-PROFILE for each new customer. In another example, col. 8 lines 4-21 of Parker specifically discloses creating a new instance of CUSTOMER-PROFILE and a new instance of CUSTOMIZED-RESOURCES for a new customer with basic telephony service. If a default record in accordance with the present invention were utilized by Parker, there would be no need to create any new instance of the CUSTOMER-PROFILE or CUSTOMIZED-RESOURCES for the new customer because the information contained in the CUSTOMER-PROFILE and the CUSTOMIZED-RESOURCES could be read from an already existing default record.

Applicant submits that Parker does not teach or suggest each default record being common to a plurality of default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned as recited in each of claims 1 and 6. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(b) should be withdrawn because Parker does not teach or suggest each feature of claims 1 and 6 and hence, dependent claim 2-5 and 7-10 thereon.

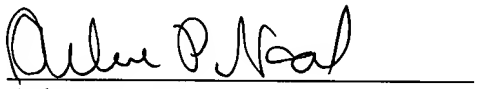
As noted previously, claims 1-10 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore

respectfully requested that all of claims 1-10 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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